

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation of Area Code Relief for the
715 Area Code in Northern Wisconsin

Docket No. 05-TN-100

**COMMENTS OF SPRINT SPECTRUM L.P. AND T-MOBILE
CENTRAL LLC**

Sprint Spectrum L.P. (“Sprint”) and T-Mobile Central LLC, doing business as T-Mobile (“T-Mobile”), jointly submit the following comments in response to the Notice of Investigation (“NOI”) issued by the Public Service Commission of Wisconsin (“Commission”) addressing area code relief for the 715 area code.¹ As explained in more detail below, Sprint and T-Mobile urge the Commission to adopt an overlay rather than a geographic split.

I. Commission Action is Necessary to Prevent Exhaust

As noted in the Commission’s NOI, the 715 area code is facing imminent exhaust.² The Commission must take action to prevent exhaust and to re-supply the depleted inventory of telephone numbering resources. These numbering resources are necessary to meet Wisconsin consumer demand for a variety of telecommunications services including wireless voice and data services and Voice over Internet Protocol (“VoIP”) services. Such numbering resources are also important from a competitive

¹ See, Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin, *Notice of Investigation*, Docket No. 5-TN-100 (Aug. 30, 2007) (“NOI”).

² See, NOI at p. 1.

standpoint because incumbent carriers typically have more numbering resources at their disposal than competitors, particularly new entrant competitors. Competitive carriers, therefore, are more sensitive to the lack of numbering resources. Indeed, without a supply of telephone numbers, a new entrant competitor may be unable to launch services in a new market.

II. Overlays Have Many Advantages Compared to Geographic Splits

As noted in the Commission's NOI, after weighing the pros and cons of an overlay versus a geographic split, the telecommunications industry reached consensus in support of an all-services overlay for the 715 area code.³ Sprint and T-Mobile fully support this recommendation and believe that an overlay is clearly in the best interest of the state of Wisconsin and its consumers. Simply put, an overlay has comparatively little impact on consumers; and, unlike a geographic split, an overlay does not create "winners and losers" within the 715 NPA.

An overlay has the following advantages over other forms of area code relief:

- Under an overlay plan, only customers obtaining new services would be assigned telephone numbers in the new area code, and only when there are no more telephone numbers available in the existing area code;
- Thus, all current residential and business customers are able to retain their existing telephone numbers including the area codes;
- For businesses, this means that owners can avoid the costs of changing signage, stationery, yellow pages advertising and other advertising, web sites, brochures, catalogs, business cards, etc., since they retain their existing business telephone numbers;
- For residential customers, adopting an overlay instead of a split will obviate the need for consumers to distribute updated phone numbers to virtually everyone they know, including family, friends, acquaintances and customers;

³ See, NOI at p. 2.

- An overlay is also less confusing for customers because the existing area code boundary will remain intact;
- All consumers are treated equally – there is no “wrong side” of the split. An overlay avoids various problems involved with the geographic splitting of local communities, by leaving existing boundaries intact;
- Wireless consumers with phones that cannot be reprogrammed “over the air” (“non-OTA phones”) will not be required to manually reprogram their phones;
- An overlay, unlike a split, does not require wireless customers to reprogram their phone’s address book;
- Splits can often create dialing confusion by requiring customers to use one dialing pattern for some calls (seven digits) and another dialing pattern for others (ten digits);
- Overlays can be implemented faster and more efficiently by carriers;
- The permissive dialing period for an overlay and customer education can be as few as three months as opposed to typically six months or longer for a split; finally,
- To the extent that additional area code relief is needed in the future, additional overlay codes can be implemented quickly, without any customer having to change their telephone number.

As these bullet points demonstrate, there are many advantages to area code relief via an all-services overlay.⁴ Indeed, a growing list of states have adopted all-services overlays as their preferred method of area code relief.⁵

III. Consumers Adapt Well to 10-Digit Dialing

Against these numerous advantages, there is typically only one concern expressed with regard to overlays – the requirement for 10-digit dialing for all calls. The Commission correctly notes that an overlay will result in ubiquitous ten-digit dialing throughout the

⁴ The Federal Communications Commission has also considered the advantages and disadvantages of geographic splits and overlays. *See, In the matter of Numbering Resource Optimization, Second Report and Order, Order on Reconsideration and Second Further Notice of Proposed Rulemaking*, CC Docket Nos. 96-98 and 99-200, at ¶¶ 62-70 (2000) (“Second NRO Order”).

⁵ The states that have implemented an all-services overlay include: Colorado, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Mississippi, North Carolina, New Jersey, New York, Ohio, Oregon, Pennsylvania, Puerto Rico, Texas, California and Virginia. Further, an all-services overlay will go into effect shortly in Utah.

715 area code.⁶ However, based upon the industry's experience in implementing numerous overlays throughout the country, consumers adapt very well and very quickly to this dialing pattern change. To begin with, 10-digit dialing is becoming increasingly common throughout the country; as a result, many people have been exposed to this dialing pattern. Furthermore, public education programs have been highly-effective in preparing consumers for 10-digit dialing.

Sprint and T-Mobile have implemented dozens of overlays throughout the country. Our collective experience demonstrates that customers transition easily and the overall customer experience has been very positive. Indeed, neither Sprint nor T-Mobile have received customer complaints regarding the requisite dialing pattern change. In addition, state utility commissions who have ordered the implementation of overlays as the form of area code relief, have detailed similar experiences regarding de minimis numbers of consumer complaints regarding 10-digit dialing. Thus, while 10-digit dialing is perceived as a negative consequence of an overlay, it is an easily learned behavior and a relatively minor consumer concern, particularly when compared to the numerous negative consequences of a geographic split.

Moreover, although an overlay requires 10-digit dialing, a split would not completely avoid 10-digit dialing for consumers in all circumstances. As noted in the Commission's NOI:

Where a geographic split line runs between telephone exchanges that currently have local calling, via extended area service (EAS) or

⁶ NOI at p. 2.

extended community calling (ECC), the calling rates do not change; however, it becomes necessary to dial the area code for these local calls.⁷

In order to allay concerns with 10-digit dialing, the Commission should allow a reasonable period of time to educate consumers in the state. The industry typically recommends a transition period of three to six months (including permissive dialing) before mandatory 10-digit dialing would go into effect.

CONCLUSION

Sprint and T-Mobile appreciate the opportunity to provide these comments and reserve the right to reply to comments filed by other interested parties.

Dated this 24th day of October, 2007.

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⁷ NOI at p. 3.